

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CAROLYN CLARK, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

Case No. 3:16-cv-00032 (MHL)

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

FRANCES D. BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

Case No. 3:16-cv-00670 (MHL)

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

**PLAINTIFFS' MOTION FOR APPROVAL OF NOTICE PLAN AND
DIRECTING NOTICE TO THE CLASS**

Pursuant to Fed. R. Civ. P. 23(e)(1), Plaintiffs, on behalf of themselves and all others similarly situated (the "Settlement Class"), in connection with the pending Motion for Preliminary Approval of Class Action Settlement (ECF No. 125), respectfully request the Court approve the form and manner of notice proposed to be sent to all members of the Settlement Class as outlined in the Memorandum and Declarations filed in support of this Motion, and in the Settlement Agreement (ECF No. 126-1).

PLAINTIFFS,
*individually and on behalf
of all others similarly
situated*

By: _____/s/
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Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/

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